

1 GIA N. MARINA
2 Nevada Bar No. 15276
3 **CLARK HILL PLLC**
4 1700 South Pavilion Center Drive, Suite 500
5 Las Vegas, Nevada 89135
6 E-mail: gmarina@clarkhill.com
Telephone: (702) 862-8300
Facsimile: (702) 778-9709
Attorney for Defendant
National Consumer Telecom & Utilities
Exchange, Inc.

7

8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9

10 PAULA MEDEIROS, }
11 Plaintiff, }
12 vs. }
13 NATIONAL CONSUMER TELECOM & }
14 UTILITIES EXCHANGE, INC.; CLARITY }
15 SERVICES, INC. and }
16 BACKGROUNDCHECKS.COM, }
17 Defendants. }
18)

Case No. 2:24-cv-02365-JCM-MDC

JOINT MOTION FOR EXTENSION OF
TIME FOR DEFENDANT NATIONAL
CONSUMER TELECOM & UTILITIES
EXCHANGE, INC. TO FILE ANSWER
FIRST REQUEST

20 Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has
21 requested an extension of time to answer, move or otherwise respond to the Complaint in this
22 matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY
23 STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or
24 otherwise respond to the Complaint in this action is extended from January 23, 2025 through and
25 including **February 24, 2025**. The request was made by NCTUE so that it can have an opportunity
26 to collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff
27
28

1 approves. This stipulation is filed in good faith and not intended to cause delay.
2

3 Respectfully submitted, this 22nd day of January, 2025.
4

5 CLARK HILL PLLC

6 By: /s/Gia N. Marina

7 Gia N. Marina

1700 South Pavilion Center Drive, Suite 500

8 Las Vegas, Nevada 89135

Telephone: (702) 862-8300

9 Facsimile: (702) 778-9709

Email: gmarina@clarkhill.com

10 Attorney for Defendant National Consumer
11 Telecom & Utilities Exchange, Inc.

No opposition

/s/ Gerardo Avalos

George Haines, Esq.

Nevada Bar No. 9411

Gerardo Avalos

Nevada Bar No. 15171

FREEDOM LAW GROUP

8985 S. Eastern Ave., Suite 350

Henderson, NV 89123

Phone: (702) 880-5554

Fax: (702) 385-5518

Email: ghaines@freedomlegalteam.com

Email: gavalos@freedomlegalteam.com

12
13 *Attorneys for Plaintiff*

14
15
16
17 IT IS SO ORDERED:
18

19
20 _____
21 United States Magistrate Judge
22 DATED: 1-22-25
23
24

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served this 22nd day of January, 2025, via CM/ECF, upon all counsel of record:

By: /s/Gia N. Marina
Gia N. Marina
Nevada Bar No. 15276
1700 South Pavilion Center Drive, Suite 500
Las Vegas, Nevada 89135
Telephone: (702) 862-8300
Facsimile: (702) 778-9709
Email: gmarina@clarkhill.com